

United States Courts
Southern District of Texas
FILED

July 16, 2024

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

JORGE HUMBERTO DELGADO VALADEZ

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Criminal No. **4:24-cr-370**

INDICTMENT

THE GRAND JURY CHARGES THAT:

Count One

(Conspiracy to Possess with Intent to Distribute a Controlled Substance)

On or about May 29, 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendant

JORGE HUMBERTO DELGADO VALADEZ

did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jury to possess with intent to distribute 5 kilograms or more of mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 846, 841(a)(1) and 841(b)(1)(A).

Count Two
(Conspiracy to Launder Monetary Instruments)

From on or about March 11, 2024 to on or about May 9, 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendant

JORGE HUMBERTO DELGADO VALADEZ

did knowingly and intentionally conspire and agree with persons known and unknown to the Grand Jury to knowingly conduct and attempt to conduct financial transactions; said transactions involved the proceeds of specified unlawful activities, namely, conspiracy to possess with intent to distribute controlled substances in violation of Title 21, United States Code, § 846 and possession with intent to distribute controlled substances in violation of Title 21, United States Code, § 841(a)(1); that while conducting the financial transactions knew that the property involved represented the proceeds of some form of unlawful activity; and knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, §§ 1956(h) and 1956(a)(1)(B)(i).

Count Three
(Laundering Monetary Instruments)

On or about March 11, 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendant

JORGE HUMBERTO DELGADO VALADEZ

did knowingly and intentionally:

- (i) conduct a financial transaction, that is, the transfer, delivery and other disposition of monetary instruments, that is, approximately \$250,000 in cash;
- (ii) the transaction involved the proceeds of specified unlawful activity, namely, possession with intent to distribute a controlled substance in violation of Title 21, United States Code, § 841(a)(1);
- (iii) that while conducting the financial transaction knew that the property involved represented the proceeds of some form of unlawful activity; and
- (iv) knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, §§ 1956(a)(1)(B)(i) and 2.

Count Four
(Laundering Monetary Instruments)

On or about March 18, 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendant

JORGE HUMBERTO DELGADO VALADEZ

did knowingly and intentionally:

- (i) conduct a financial transaction, that is, the transfer, delivery and other disposition of monetary instruments, that is, approximately \$300,000 in cash;
- (ii) the transaction involved the proceeds of specified unlawful activity, namely, possession with intent to distribute a controlled substance in violation of Title 21, United States Code, § 841(a)(1);
- (iii) that while conducting the financial transaction knew that the property involved represented the proceeds of some form of unlawful activity; and
- (iv) knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, §§ 1956(a)(1)(B)(i) and 2.

Count Five
(Laundering Monetary Instruments)

On or about May 9, 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendant

JORGE HUMBERTO DELGADO VALADEZ

did knowingly and intentionally:

- (i) conduct a financial transaction, that is, the transfer, delivery and other disposition of monetary instruments, that is, approximately \$39,000 in cash;
- (ii) the transaction involved the proceeds of specified unlawful activity namely, possession with intent to distribute a controlled substance in violation of Title 21, United States Code, § 841(a)(1);
- (iii) that while conducting the financial transaction knew that the property involved represented the proceeds of some form of unlawful activity; and
- (iv) knowing that the transaction was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity.

In violation of Title 18, United States Code, §§ 1956(a)(1)(B)(i) and 2.

Count Six

(Possession with Intent to Distribute a Controlled Substance)

On or about May 29, 2024, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, defendant

JORGE HUMBERTO DELGADO VALADEZ

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was more 5 kilograms or more, that is, approximately 50 kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

A TRUE BILL

Original Signature on File

FOREPERSON

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY

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Anibal J. Alaniz
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